



September 29, 2014

VIA ELECTRONIC TRANSMISSION

Ms. Doris Lefkowitz
Report Clearance Officer
Agency for Healthcare Research and Quality
Department of Health and Human Services
540 Gaither Road
Rockville, MD 20850

Re: Agency Information Collection Activities: Proposed Collection; Comment Request: Care Coordination Quality Measure for Patients in the Primary Care Setting

Dear Ms. Lefkowitz:

Planned Parenthood Federation of America (“Planned Parenthood”) and Planned Parenthood Action Fund (“the Action Fund”) are pleased to submit these comments on the proposed Care Coordination Quality Measure for Patients in the Primary Care Setting project. As a trusted women’s health care provider and advocate, Planned Parenthood supports the Agency for Healthcare Research and Quality’s (AHRQ’s) work to facilitate better care coordination as a part of improving health outcomes. At the same time, it is essential that the unique health care needs of women are integrated into this effort. Indeed, doing so would align with the U.S. Department of Health and Human Services’ (HHS’s) efforts to ensure the delivery of high quality family planning services, in line with the recent release of the Quality Family Planning Services Guidelines.

Conversations about primary care too often ignore the reality that the main health care services many women, and especially younger women, are seeking are reproductive health services. Recent research underscores the fact that the majority of health care services women access are women’s health services. This research found that the top services women said they needed in the last two years were annual exams (56 percent), a Pap test (49 percent), and birth control (34 percent).¹ This research reinforces that discussions about primary care and how to measure quality of care must include an emphasis on women’s health care.

As the AHRQ is seeking to develop quality measures that accurately quantify the quality of care patients are receiving in a primary care setting, we recommend that measures be included that reflect the care women need. For women, one of the most important components of their care centers on reproductive health care and family planning. We recommend including the following questions to ensure primary

¹ PerryUndem Research & Communication. “Women & OB/GYN providers”. Research conducted for Planned Parenthood Federation of America, November 2013.

care providers are having conversations with women about family planning and are ensuring women are using contraceptive methods that meet their needs.

1. Did your health care provider ask if you would like to become pregnant in the next year?
2. If you have been prescribed any birth control method, have you continued to use the method you were prescribed?
3. If you are using a birth control method, were you asked whether you are satisfied with your method of birth control?

These questions are important for ensuring women are receiving high quality family planning care. In fact, some states are beginning to incorporate them into quality initiatives. For example, the state of Oregon has an initiative encouraging primary care providers to ask female patients if they want to become pregnant in the next year as a way of beginning a conversation about family planning if appropriate. Researchers estimate that by asking this question in Oregon—a state with a nearly 50 percent unintended pregnancy rate—it could prevent 90% of unintended pregnancies and save \$75.5 million per year.² This estimate is consistent with longstanding research demonstrating that family planning improves infant and maternal health outcomes and saves millions of dollars.³

Planned Parenthood looks forward to continuing to work with HHS to ensure a high quality of care coordination is provided to women in a primary care setting. Thank you for the opportunity to comment on Care Coordination Quality Measure for Patients in the Primary Care Setting. If you have any questions, please do not hesitate to contact me at 202-973-4800.

Respectfully submitted,



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² *The One Key Question*. <http://www.onekeyquestion.org/> (accessed September 23, 2014)

³ Frost, Jennifer, et al. "Contraceptive Needs and Services, 2010." *Guttmacher Institute*. July 2013. <http://www.guttmacher.org/media/nr/2013/07/30/> (accessed September 23, 2014)